

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:20CR251
)	
Plaintiff,)	
)	JUDGE SARA LIOI
v.)	
)	
DAVID M. SCHADE,)	<u>UNITED STATES' MOTION TO FILE</u>
)	<u>SENTENCING MEMORANDUM UNDER</u>
Defendant.)	<u>SEAL</u>
)	

The United States of America, by its counsel, Bridget M. Brennan, Acting United States Attorney, and Carol M. Skutnik, Assistant United States Attorney, hereby requests the Court issue an order permitting the government to file its sentencing memorandum under seal.

On June 21, 2021, Defendant entered a plea of guilty to the Indictment that included a violation of 18 U.S.C. §2251(a), Sexual Exploitation of Children involving Minor Victim #1.

The government intends to file a sentencing memorandum that freely discusses Minor Victim #1 and the circumstances of the offense. 18 U.S.C. § 3509(d) addresses the unique privacy protections that apply to minor victims in these types of cases. The statute requires that documents that disclose the name or any other information concerning a child be kept in a secure place, and that papers filed in court that disclose information about the child be filed under seal. In addition, the government's memorandum addresses some sensitive matters involving the Defendant. Accordingly, to protect the victim's privacy and to freely discuss the sentencing

information applicable in this case, the government respectfully requests the Court issue an order permitting the government to file its sentencing memorandum under seal.

Respectfully submitted,

Bridget M. Brennan
Acting United States Attorney

By: /s/ Carol M. Skutnik
Carol M. Skutnik (OH: 0059704
Assistant United States Attorneys
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852
(216) 622-3785
Carol.Skutnik@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of September 2021, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Carol M. Skutnik
Carol M. Skutnik
Assistant U.S. Attorney